

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CYRANO, INC.,  
Plaintiff,

v.

QUOTIUM TECHNOLOGIES, INC.,

QUOTIUM TECHNOLOGIES, S.A.,

and

TECHNOLOGIES, S.A.,  
Defendants.

**CIVIL ACTION NO. 05-CV-11558-DPW**

**ASSENTED-TO MOTION TO ENLARGE TIME  
IN WHICH TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), Defendants Quotium Technologies, S.A and Technologies, S.A. (together, the “French Defendants”) move the Court for an extension of the time in which to answer or otherwise respond to the Complaint of Cyrano, Inc. (“CI”). The enlargement sought is to September 19, 2005.

As grounds for this request, the French Defendants state as follows:

- On July 25, 2005, CI commenced an action in this Court against them and an affiliated United States company, Quotium, Inc., located in Beverly, Massachusetts;
- The French defendants are located in France, where they were served;
- All three defendants are adverse to CI in another suit pending in this judicial district, and they have conducted a joint case in that action;
- It is in the interests of judicial economy for the three defendants to continue their joint case in the present action, which concerns the same subject matter as the pending action;
- The response date for the affiliated United States defendant is September 19, 2005; and
- CI has assented to the extension requested here.

WHEREFORE, for all of the foregoing reasons, the Court should grant this motion and allow Defendants Quotium Technologies, S.A and Technologies, S.A. until

and including September 19, 2005 to file with co-defendant Quotium Technologies, Inc.  
a joint answer or response to the Complaint.

Respectfully submitted,

DATED: September 7, 2005

QUOTIUM TECHNOLOGIES, S.A., and  
TECHNOLOGIES, S.A.

By their attorneys,

/s/ Kevin J. O'Connor

Kevin J. O'Connor (BBO# 555250)  
Mayeti Gametchu (BBO# 647787)  
John R. Pagliaro (BBO# 634483)  
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**Local Rule 7.1 Certificate Of Compliance**

I hereby certify that on September 2, 2005, I conferred by telephone with Michael Sugrue, counsel of record for Plaintiff Cyrano, Inc., in a good faith attempt to resolve or narrow the issues and that Attorney Sugrue, on behalf of the Plaintiff, assented to the extension sought in this motion.

/s/ Kevin J. O'Connor

Kevin J. O'Connor

**Certificate of Service**

I hereby certify that on September 7, 2005, I served a copy of the foregoing motion by first class mail, post paid, on Michael Sugrue, counsel of record for the Defendant Cyrano, Inc.

/s/ John R. Pagliaro

John R. Pagliaro